



**GVNW CONSULTING, INC.**

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June 26, 2015

**REDACTED – FOR PUBLIC INSPECTION**

*VIA UPS and ECFS*

Marlene H. Dortch, Secretary  
Federal Communication Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Confidential Financial Information Subject to Protective Order in WC Docket Nos. 10-90, 07-135, 05-337, 03-109, 14-58, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, and requesting Confidential treatment for financial information pursuant to sections 0.457 and 0.459 of the Commission's rules. Before the Federal Communications Commission. Form 481 – Carrier Annual Reporting Data Collection, 2015. WC 14-58, 11-42

Dear Ms. Dortch:

On behalf of Mud Lake Telephone Cooperative ("Mud Lake"), GVNW Consulting, Inc. hereby submits the attached redacted and confidential versions of its "FCC Form 481 – Carrier Annual Reporting Data Collection" information pursuant to sections 54.313 and 54.422 of the Commission's rules, as filed with the Universal Service Administrative Company. A copy is also being submitted to the Idaho Public Regulatory Commission.

Mud Lake requests confidential treatment under the Protective Order adopted in this proceeding for the section 54.313(f)(2) financial information included in this report on the grounds that it is competitively sensitive information that is secure from public access and this information should not be released publicly for inspection as it could be used to disadvantage or harm Mud Lake. In addition, Mud Lake is requesting confidential treatment pursuant to sections 0.457 and 0.459 of the Commission's rules for the Five-Year Build-Out Plan Progress Report and Map that is required by section 54.313(a)(1) to be attached to this report.

In accordance with the Protective Order, two redacted copies marked "REDACTED – FOR PUBLIC INSPECTION" and one non redacted confidential version marked "CONFIDENTIAL – NOT FOR PUBLIC INSPECTION" are being filed with the Commission. A redacted copy has also been filed via the Electronic Comment Filing System.

If you have any questions, please contact me at [jushio@gvnw.com](mailto:jushio@gvnw.com) or 719-594-5814.

Sincerely,

/s/ Judi Ushio

Judi Ushio  
Midwest Division Manager

cc: Mr. Charles Tyler, FCC Telecommunications Access Policy Division  
(two copies, confidential)

**REDACTED – FOR PUBLIC INSPECTION**

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT – LINE 112**

**ATTACHMENT REDACTED IN ITS ENTIRETY**

<010>	Study Area Code	472227
<015>	Study Area Name	MUD LAKE TEL COOP
<020>	Program Year	2016
<030>	Contact Name: Person USAC should contact with questions about this data	Judi Ushio
<035>	Contact Telephone Number: Number of the person identified in data line <030>	7195945814 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	jushio@gvnw.com

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
		(check box when complete)	
<100>	Service Quality Improvement Reporting (complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200>	Outage Reporting (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input checked="" type="checkbox"/> <-- check box if no outages to report	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300>	Unfulfilled Service Requests (voice) 0	<input type="checkbox"/>	<input type="checkbox"/>
<310>	Detail on Attempts (voice) (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband) 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330>	Detail on Attempts (broadband) (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)		
<410>	Fixed 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile 0.0	<input type="checkbox"/>	<input type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<440>	Fixed 0.0	<input type="checkbox"/>	<input type="checkbox"/>
<450>	Mobile 0.0	<input type="checkbox"/>	<input type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	472227id510.pdf (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	472227id610.pdf (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<710>	Company Price Offerings (broadband) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<800>	Operating Companies and Affiliates (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/> (if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000>	Voice Services Rate Comparability Certification Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010>	472227id1010.pdf (attach descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1100>	Certify whether terrestrial backhaul options exist (Yes or No) <input checked="" type="radio"/> <input type="radio"/> (if not, check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers (complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

<3000>	2 (check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

(100) Service Quality Improvement Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	472227
<015>	Study Area Name	MUD LAKE TEL COOP
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	
<035>	Contact Telephone Number - Number of person identified in data line <030>	Judi Ushio 7195945814 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jushio@gvnmw.com
<110>	Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing	<input checked="" type="radio"/> (yes / no)
<111>	year plan" filed with the FCC?	<input type="radio"/> (yes / no)

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.



Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	Yes
<114>	Report how much universal service (USF) support was received	Yes
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	Not Applicable











(900) Tribal Lands Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	472227
<015>	Study Area Name	MUD LAKE TEL COOP
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Judi Ushio
<035>	Contact Telephone Number - Number of person identified in data line <030>	7195945814 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jushio@gvnw.com

<910>

Tribal Land(s) on which ETC Serves

<920>

Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	<div>Select Yes or No or Not Applicable</div>
<922>	Feasibility and sustainability planning;	
<923>	Marketing services in a culturally sensitive manner;	
<924>	Compliance with Rights of way processes	
<925>	Compliance with Land Use permitting requirements	
<926>	Compliance with Facilities Siting rules	
<927>	Compliance with Environmental Review processes	
<928>	Compliance with Cultural Preservation review processes	
<929>	Compliance with Tribal Business and Licensing requirements.	

8

<b>(1100) No Terrestrial Backhaul Reporting</b>		FCC Form 481	
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819	
		July 2013	

<010>	Study Area Code	472227
<015>	Study Area Name	MUD LAKE TEL COOP
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	
<035>	Contact Telephone Number - Number of person identified in data line <030>	
<039>	Contact Email Address - Email Address of person identified in data line <030>	

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<b>(1200) Terms and Condition for Lifeline Customers</b>		FCC Form 481
<b>Lifeline</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
<b>Data Collection Form</b>		July 2013

<010>	Study Area Code	472227
<015>	Study Area Name	MUD LAKE TEL COOP
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Judi Ushio
<035>	Contact Telephone Number - Number of person identified in data line <030>	7195945814 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jushio@gvntw.com

<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	<div>472227id1210.pdf</div>	Name of Attached Document
<1220>	Link to Public Website	HTTP	

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

<b>(2000) Price Cap Carrier Additional Documentation</b>		FCC Form 481	
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819	
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>		July 2013	

<010>	Study Area Code	472227
<015>	Study Area Name	WUD LAKE IEL COOP
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	JUDI USHIO
<035>	Contact Telephone Number - Number of person identified in data line <030>	7195945614 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jushio@gvnuw.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

<2010>	2nd Year Certification {47 CFR § 54.313(b)(1)i}	
<2011a>	3rd Year Certification {47 CFR § 54.313(b)(1)ii}	
<2011b>	Attachment {47 CFR § 54.313(b)(1)ii}	

**Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}**

<2012>	2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}	
<2013>	2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}	
<2014>	2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}	
<2015>	2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}	

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

<2016>	Certification Support Used to Build Broadband	
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**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

<2017>	3rd year Broadband Service Certification	
<2018>	5th year Broadband Service Certification	
<2019>	Interim Progress Certification	
<2020>	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	
<2021>	Interim Progress Community Anchor Institutions	

Name of Attached Document(s) Listing Required Information

<010>	Study Area Code	472227
<015>	Study Area Name	MUD LAKE TEL COOP
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Judi Ushio
<035>	Contact Telephone Number - Number of person identified in data line <030>	7195945814 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jushio@gvzw.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010)

Progress Report on 5 Year Plan

Milestone Certification (47 CFR § 54.313(f)(1)(ii))

4722271d3010.pdf

Name of Attached Document Listing Required Information

(3011)

Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

☒

(3012)

Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

4722271d3012.pdf

Name of Attached Document Listing Required Information

(3013)

Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

☒

(3014)

If yes, does your company file the RUS annual report

☒

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015)

Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

☐

(3016)

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3017)

If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

4722271d3017.pdf

Name of Attached Document Listing Required Information

(3018)

If the response is no on line 3014, Is your company audited?

☒

(3019)

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

☒

(3019)

Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

☒

(3020)

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☒

(3021)

Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit

☒

(3021)

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

☐

(3022)

Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

☐

(3023)

Underlying information subjected to a review by an independent certified public accountant

☐

(3024)

Underlying information subjected to an officer certification.

☐

(3025)

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

4722271d3026.pdf

Name of Attached Document Listing Required Information

(3026)

Attach the worksheet listing required information

☐

<010>	Study Area Code	472227
<015>	Study Area Name	MUD LAKE TEL COOP
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Judi Ushio
<035>	Contact Telephone Number - Number of person identified in data line <030>	7195945814 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jushio@gvzw.com

Financial Data Summary	
(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	

<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	472227
<015>	Study Area Name	MUD LAKE TEL COOP
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Judi Ushio
<035>	Contact Telephone Number - Number of person identified in data line <030>	7195945814 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jushio@gvnw.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: MUD LAKE TEL COOP	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/25/2015
Printed name of Authorized Officer: Randy Mead	
Title or position of Authorized Officer: General Manager	
Telephone number of Authorized Officer: 2083746517 ext.	
Study Area Code of Reporting Carrier: 472227	Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	472227
<015> Study Area Name	MUD LAKE TEL COOP
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Judi Ushio
<035> Contact Telephone Number - Number of person identified in data line <030>	7195945814 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jushio@gvnw.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

<b>Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

<b>Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

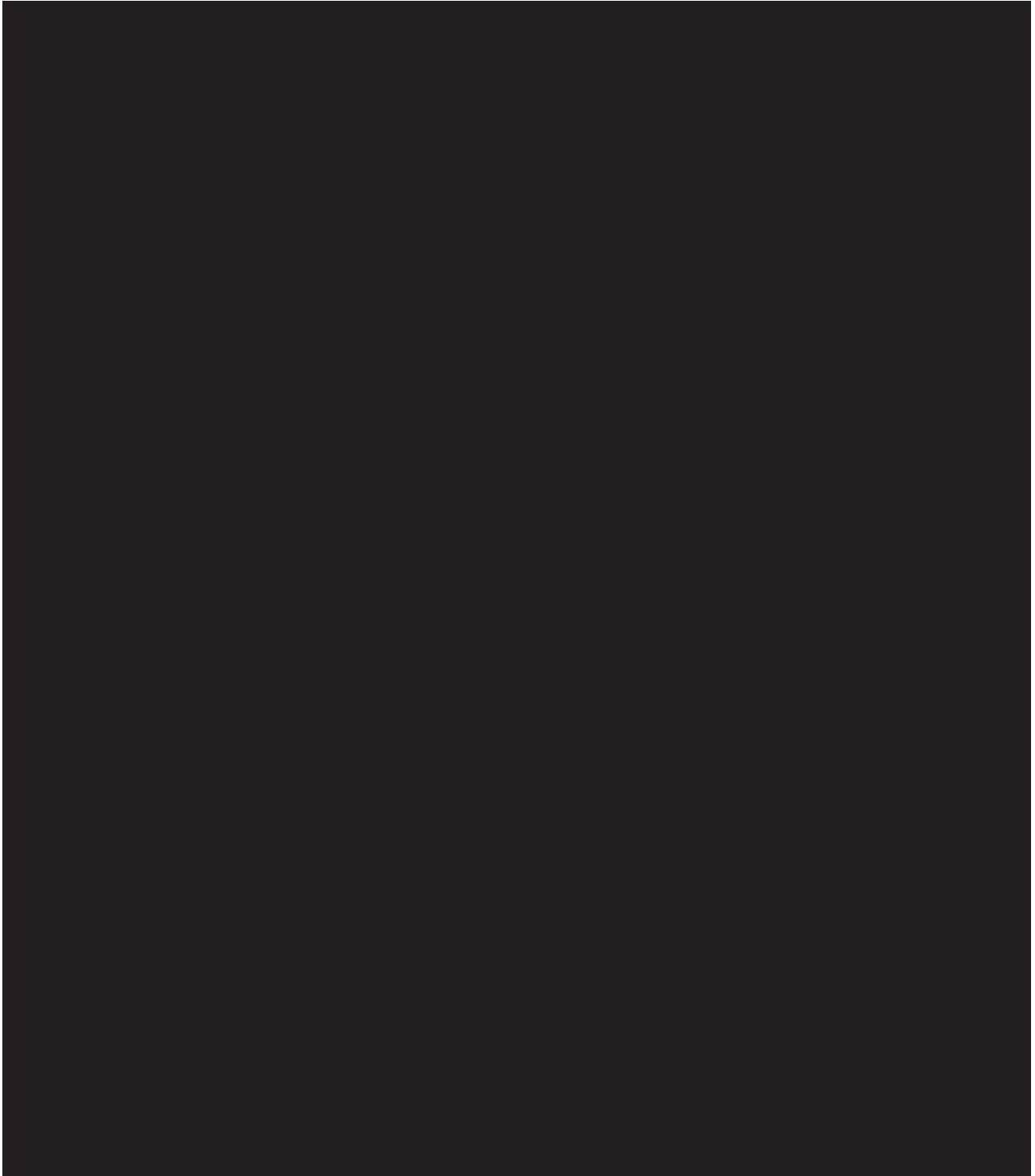


## Attachments





**2015**  
**PROGRESS REPORT ON QUALITY IMPROVEMENT PLAN**



[REDACTED]

[REDACTED]

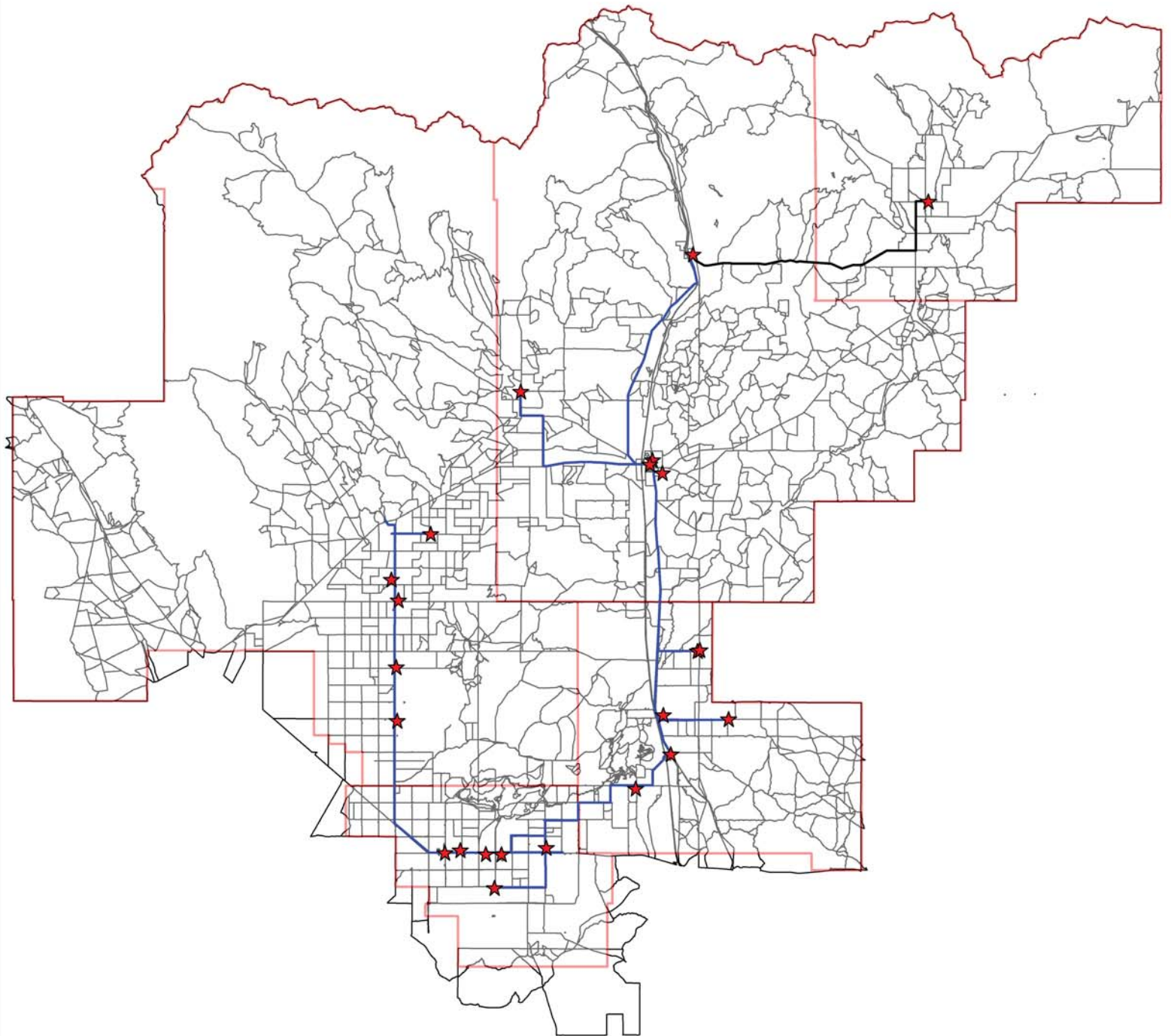
[REDACTED]

[REDACTED]

**MUD LAKE TELEPHONE COOPERATIVE ASSOCIATION  
NETWORK IMPROVEMENT PROJECTS-PROGRESS REPORT  
AS OF 2015 ANNUAL REPORT SUBMISSION - JULY 1, 2015**

[illegible]

## Mud Lake Telephone Cooperative Network by Census Blocks



— Fiber

— Copper

★ Equipment

□ Census Blocks

□ MudLake Telephone Coop  
Exchange Boundaries

472227ID510

## **Service Quality Standards & Consumer Protection Rules Compliance:**

### **Consumer Protection**

#### Voice and Broadband

Mud Lake complies with the requirements of 47CFR Part 64 Subpart U, Customer Proprietary Network Information and the Federal Trade Commission Red Flag Rules to prevent identity theft. A manual for each of those programs is in place and is part of the employees' handbook. Employee training is conducted annually and new hires are instructed on the programs as required by their job functions.

### **Service Quality Standards**

#### Voice

Mud Lake complies with the service standards as required by the state regulatory commission. Mud Lake is committed to providing the highest quality service to its customers.

#### Broadband

Mud Lake complies with the service standards as established by state regulatory commission. Mud Lake follows the service standards noted in NECA Tariff #5 and is committed to provide the highest quality service to its broadband customers.



## **Description of Functionality In Emergency Situations**

### Back-up Power for Both Voice and Broadband Services

Mud Lake Telephone prides itself on updating and maintaining all its plant and equipment to prevent outages before they happen. If outages do happen, the Company has 24-hour on call staff and alarm reporting systems in place that send notifications to the 24 hour personnel monitoring these systems. The Company certifies that it follows best practices that are designed to allow them to remain functional in an emergency situation through the use of back-up power to ensure functionality in the event of a limited commercial power failure.

Mud Lake utilizes battery back-up systems and standby generators in its central offices. This enables Mud Lake to maintain power during an outage of at least 4 to 8 hours with battery back-up, and for 48 hours utilizing stored fuel. Mud Lake also uses its portable gas powered generator to support the remote cabinets in the network in the event of an extended power outage.

The Company performs exercises to test disaster preparedness on each site's back-up power systems which are tested weekly. Major transport facilities are also tested periodically to ensure failover reliability.

### Ability to reroute traffic/data around damaged facilities

Mud Lake Telephone has a folded ring architecture, so it has some redundancy in rerouting exchange traffic between its five exchanges in case of damaged CWF facilities. The five year improvement plan incorporates additional fiber improvements that will make this a full fiber ring architecture/network with complete redundancy in between its exchanges.

The Company is also a partner of the Idaho Syringa Network, which provides a fiber ring throughout southern Idaho and Mud Lake's study area. Being on the Syringa ring network provides the Company the capability of re-routing interexchange traffic and providing continuous service in emergency situations due to damaged facilities.

### Capability to manage traffic/data spikes resulting from emergency situations

Mud Lake's trunk routes are monitored by Central Office equipment for usage utilization and management. Mud Lake Telephone takes no responsibility for the capabilities of interconnected networks to manage traffic spikes resulting from emergency situations, but will continue its best efforts for its networks during such events.

472227ID1010

## **Voice Services Rate Comparability**

As evidenced by the data provided in line 700 of this Form 481, Mud Lake's voice service pricing is no more than 2 standard deviations above the national average urban rate (\$47.48) as announced by the Wireline Competition Bureau on April 16, 2015 (DA 15-470)

## **Mud Lake Telephone Cooperative Association Lifeline Assistance Program**

The Lifeline Telephone Assistance Program provides for a discount of the recurring monthly rate for the provision of local residential service for certain low-income customers, which service provides an unlimited number of local calling minutes.

The Lifeline Telephone Assistance Program discount is only available to low-income customers who meet eligibility requirements established by the Federal Communications Commission.

The Federal Communications Commission national eligibility criteria include subscribers with a household income of 135 percent of the federal poverty level or participation in one of the following programs: Supplemental Nutrition Assistance Program, Medicaid, Temporary Aid to Needy Families, Supplemental Security Income, Low Income Home Energy Assistance Program, National Free Lunch or Federal Public Housing Assistance.

Eligible Lifeline customers will receive a monthly discount of \$9.25 through the Federal Communications Commission's Lifeline Program and a \$2.50 monthly discount through the Idaho Telephone Service Assistance Program on the regular Company rates for residential service. Only one telephone number per household is eligible for a Lifeline discount.

A Lifeline customer may not be disconnected from local service solely for non-payment of toll charges, but the Lifeline customer must continue to pay the local service rates and charges.

As for toll, lifeline subscribers, similar to every Mud Lake Telephone subscriber, are free to choose their own toll usage plans through IXC's that serve Mud Lake. Toll blocking is available at no charge to qualifying Lifeline customers. If a qualifying Lifeline customer voluntarily elects toll blocking service from the Company, where that service is available, the customer will not be required to pay a deposit, if otherwise applicable, to initiate service.

**TO APPLY:** Potential Lifeline customers must contact a Community Action Partnership office or an Idaho Department of Health and Welfare Regional Office to determine their eligibility to participate in the program.

59 W. Main  
POB 235  
Dubois, ID 83423



T-208-374-5150  
T-208-374-5150  
F-208-374-5688

June 1, 2015

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

Re: WC Docket No. 14-58, 2015 Annual Report, Form 481 for High-Cost Recipient  
54.313(f)(1) "Milestone Certification"

Dear Ms. Dortch:

In compliance with the filing requirements associated with, and attached to Form 481, we wish to advise the Commission that Mud Lake Telephone Cooperative Association:

- Has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of 4 Mbps downstream / 1 Mbps upstream;
- Provides latency suitable for real-time applications including VoIP and usage capacity which is reasonably comparable to those in urban areas and;
- That reasonable requests for service are met within a reasonable timeframe.

Sincerely,

A handwritten signature in blue ink that reads 'Justin Petersen'.

Justin Petersen

472227ID3012

## **ANCHOR INSTITUTIONS WITHIN MUD LAKE TELEPHONE COOPERATIVE ASSOCIATION'S TERRITORY**

No anchor institutions required or requested broadband service in 2014. Mud Lake continues to monitor customer demand and technological innovation, planning to size it network in anticipation of requests and demand for higher speed broadband needs.



MUD LAKE TELEPHONE COOPERATIVE  
ASSOCIATION, INC. AND SUBSIDIARY

CONSOLIDATED FINANCIAL STATEMENTS  
TOGETHER WITH  
INDEPENDENT AUDITORS' REPORT

DECEMBER 31, 2014

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*Depend on our people. Count on our advice.<sup>SM</sup>*

**MUD LAKE TELEPHONE COOPERATIVE ASSOCIATION, INC. AND SUBSIDIARY****CONTENTS**


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## INDEPENDENT AUDITORS' REPORT

Board of Directors  
Mud Lake Telephone Cooperative Association, Inc. and Subsidiary  
Dubois, Idaho

### Report on the Financial Statements

We have audited the accompanying financial statements of Mud Lake Telephone Cooperative Association, Inc. and Subsidiary, which comprise the balance sheet as of December 31, 2014 and 2013, and the related consolidated statements of operations, comprehensive income, members' equity and cash flows for the years then ended, and the related notes to the financial statements.

### Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

### Auditors' Responsibility

Our responsibility is to express an opinion on these financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

### Opinion

In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the financial position of Mud Lake Telephone Cooperative Association, Inc. and Subsidiary as of December 31, 2014 and 2013, and the consolidated results of their operations and their cash flows for the years then ended in conformity with accounting principles generally accepted in the United States of America.

St. Paul, Minnesota  
June 16, 2015

*Olsen Thielen & Co., Ltd*



**MUD LAKE TELEPHONE COOPERATIVE ASSOCIATION, INC. AND SUBSIDIARY**

**CONSOLIDATED BALANCE SHEET  
DECEMBER 31, 2014 AND 2013**

ASSETS		
		<div>2014</div> <div>2013</div>
<b>CURRENT ASSETS:</b>		
Cash		
Certificates of Deposit		
Investment Securities		
Due from Customers, Less Allowance of \$7,614		
Other Accounts Receivable		
Income Taxes Receivable		
Materials and Supplies		
Propane Inventory		
Prepaid Expenses		
Total Current Assets		
<b>INVESTMENTS AND OTHER ASSETS:</b>		
Certificates of Deposit		
Investment Securities		
Other Investments		
Note Receivable		
Deferred Charges		
Total Investments and Other Assets		
<b>PROPERTY, PLANT AND EQUIPMENT:</b>		
In Service		
Plant Under Construction		
Total Property, Plant and Equipment		
Less Accumulated Depreciation		
Net Property, Plant and Equipment		
<b>TOTAL ASSETS</b>		
<b>LIABILITIES AND MEMBERS' EQUITY</b>		
<b>CURRENT LIABILITIES:</b>		
Accounts Payable		
Advance Billings and Payments		
Total Current Liabilities		
<b>MEMBERS' EQUITY:</b>		
Patronage Capital		
Other Equity (Deficit)		
Accumulated Other Comprehensive Income		
Total Members' Equity		
<b>TOTAL LIABILITIES AND MEMBERS' EQUITY</b>		

*The accompanying notes are an integral part of the consolidated financial statements.*

# MUD LAKE TELEPHONE COOPERATIVE ASSOCIATION, INC. AND SUBSIDIARY

## CONSOLIDATED STATEMENT OF OPERATIONS YEARS ENDED DECEMBER 31, 2014 AND 2013

	2014	2013
<b>OPERATING REVENUES:</b>		
Local Network		
Network Access		
Internet Services		
Propane Sales		
Lease Revenue		
Other Services		
Miscellaneous		
Uncollectibles, Net		
Total Operating Revenues		
<b>OPERATING EXPENSES:</b>		
Plant, Maintenance and Access		
Depreciation		
Customer		
Corporate		
Other Taxes		
Costs of Good Sold - Propane		
Other Operating - Propane		
Total Operating Expenses		
<b>OPERATING MARGIN</b>		
<b>OTHER INCOME AND EXPENSES:</b>		
Interest, Dividends and Securities Sales		
Sale of Other Assets		
Equity in Investment Earnings		
Miscellaneous		
Net Other Income and Expenses		
<b>NET MARGINS</b>		

*The accompanying notes are an integral part of the consolidated financial statements.*

**MUD LAKE TELEPHONE COOPERATIVE ASSOCIATION, INC. AND SUBSIDIARY**




**STATEMENT OF COMPREHENSIVE INCOME  
YEARS ENDED DECEMBER 31, 2014 AND 2013**

	<u>2014</u>	<u>2013</u>
NET MARGINS		
OTHER COMPREHENSIVE LOSS:		
Unrealized Loss on Available-for-Sale Securities		
Reclassification Adjustment for Losses		
Recognized in Net Margins		
Other Comprehensive Loss		
COMPREHENSIVE INCOME		

*The accompanying notes are an integral part of the consolidated financial statements.*

**MUD LAKE TELEPHONE COOPERATIVE ASSOCIATION, INC. AND SUBSIDIARY**

**CONSOLIDATED STATEMENT OF MEMBERS' EQUITY  
YEARS ENDED DECEMBER 31, 2014 AND 2013**

	<u>Patronage Capital</u>	<u>Other Equity (Deficit)</u>	<u>Accumulated Other Comprehensive Income</u>	<u>Total</u>
<b>BALANCE on December 31, 2012</b>				
Net Margins				
Adjustment of Prior Year Margin Allocation				
Miscellaneous				
Other Comprehensive Loss				
Retirement of Patronage Capital				
Change in Unclaimed Capital Credits				
<b>BALANCE on December 31, 2013</b>				
Net Margins				
Adjustment of Prior Year Margin Allocation				
Miscellaneous				
Other Comprehensive Loss				
Retirement of Patronage Capital				
Retirement of Reclaimed Capital Credits				
Change in Unclaimed Capital Credits				
<b>BALANCE on December 31, 2014</b>				

*The accompanying notes are an integral part of the consolidated financial statements.*

**MUD LAKE TELEPHONE COOPERATIVE ASSOCIATION, INC. AND SUBSIDIARY**

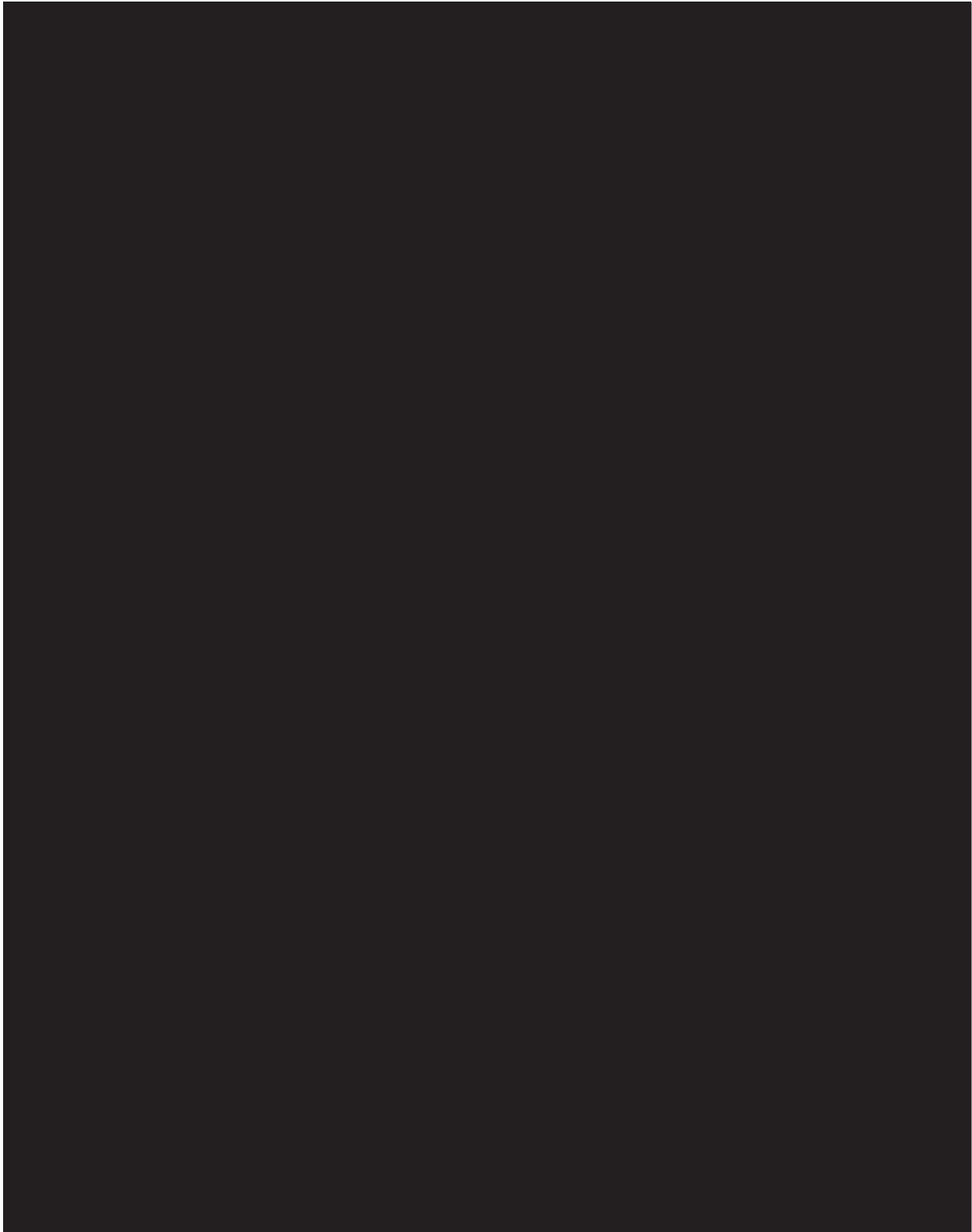
**CONSOLIDATED STATEMENT OF CASH FLOWS  
YEARS ENDED DECEMBER 31, 2014 AND 2013**

	<u>2014</u>	<u>2013</u>
<b>CASH FLOWS FROM OPERATING ACTIVITIES:</b>		
Net Margins		
Adjustments to Reconcile Net Margins to Net Cash		
Provided By Operating Activities:		
Depreciation		
Equity in Investment Earnings		
Distributions from Stock and LLC Investments		
Income from Patronage Sources		
Loss on Sale of Investment Securities		
Gain on Sale of Other Assets		
Changes in Assets and Liabilities:		
Due from Customers		
Other Accounts Receivable		
Income Taxes Receivable		
Propane Inventory		
Prepaid Expenses		
Accounts Payable		
Advance Billings and Payments		
Net Cash Provided By Operating Activities		
<b>CASH FLOWS FROM INVESTING ACTIVITIES:</b>		
Additions to Property, Plant and Equipment		
(Increase) Decrease in Materials and Supplies		
Purchase of Certificates of Deposits		
Sale of Certificates of Deposits		
Purchase of Investment Securities		
Sale of Investment Securities		
Collections on Note Receivable		
Sale of Other Assets		
Net Cash Used In Investing Activities		
<b>CASH FLOWS FROM FINANCING ACTIVITIES:</b>		
Increase (Decrease) in Other Equity		
Retirement of Reclaimed Capital Credits		
Retirements of Patronage Capital		
Net Cash Used In Financing Activities		
<b>NET CHANGE IN CASH</b>		
<b>CASH at Beginning of Year</b>		
<b>CASH at End of Year</b>		
<b>SUPPLEMENTAL DISCLOSURES OF CASH FLOWS INFORMATION:</b>		
Net Cash Payments for Income Taxes		

*The accompanying notes are an integral part of the consolidated financial statements.*

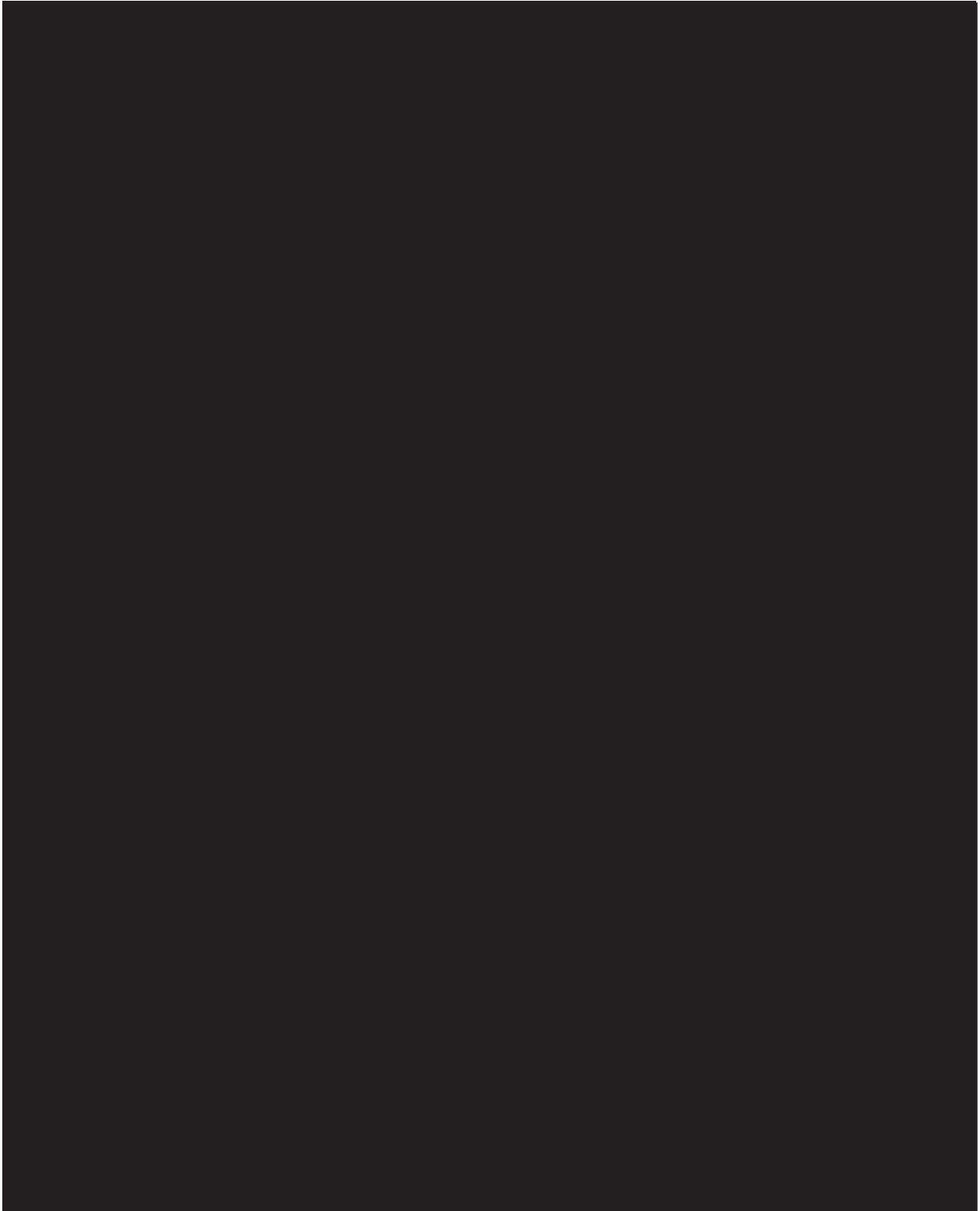
**MUD LAKE TELEPHONE COOPERATIVE ASSOCIATION, INC. AND SUBSIDIARY**  
**NOTES TO CONSOLIDATED FINANCIAL STATEMENTS**

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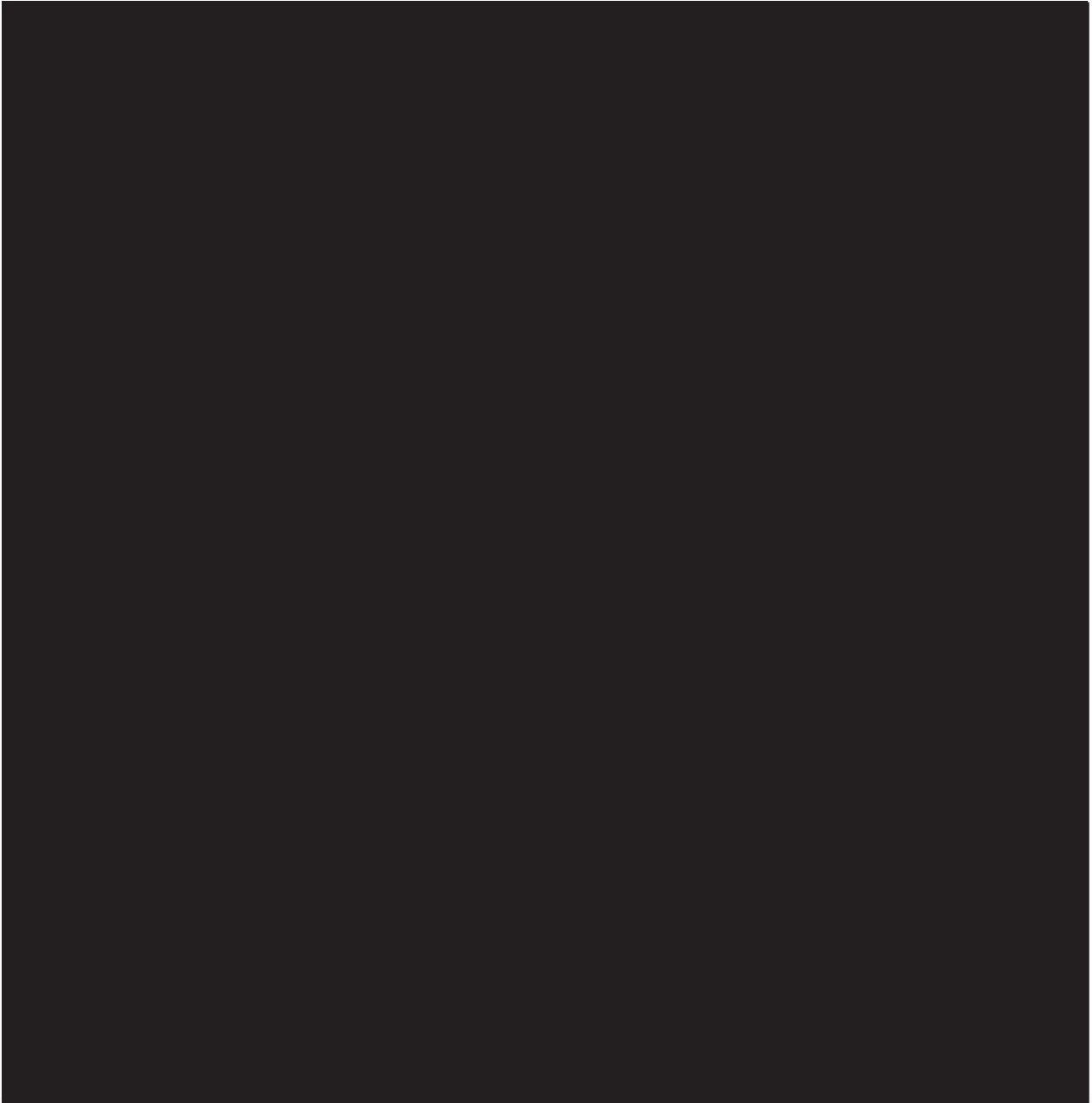
**MUD LAKE TELEPHONE COOPERATIVE ASSOCIATION, INC. AND SUBSIDIARY**  
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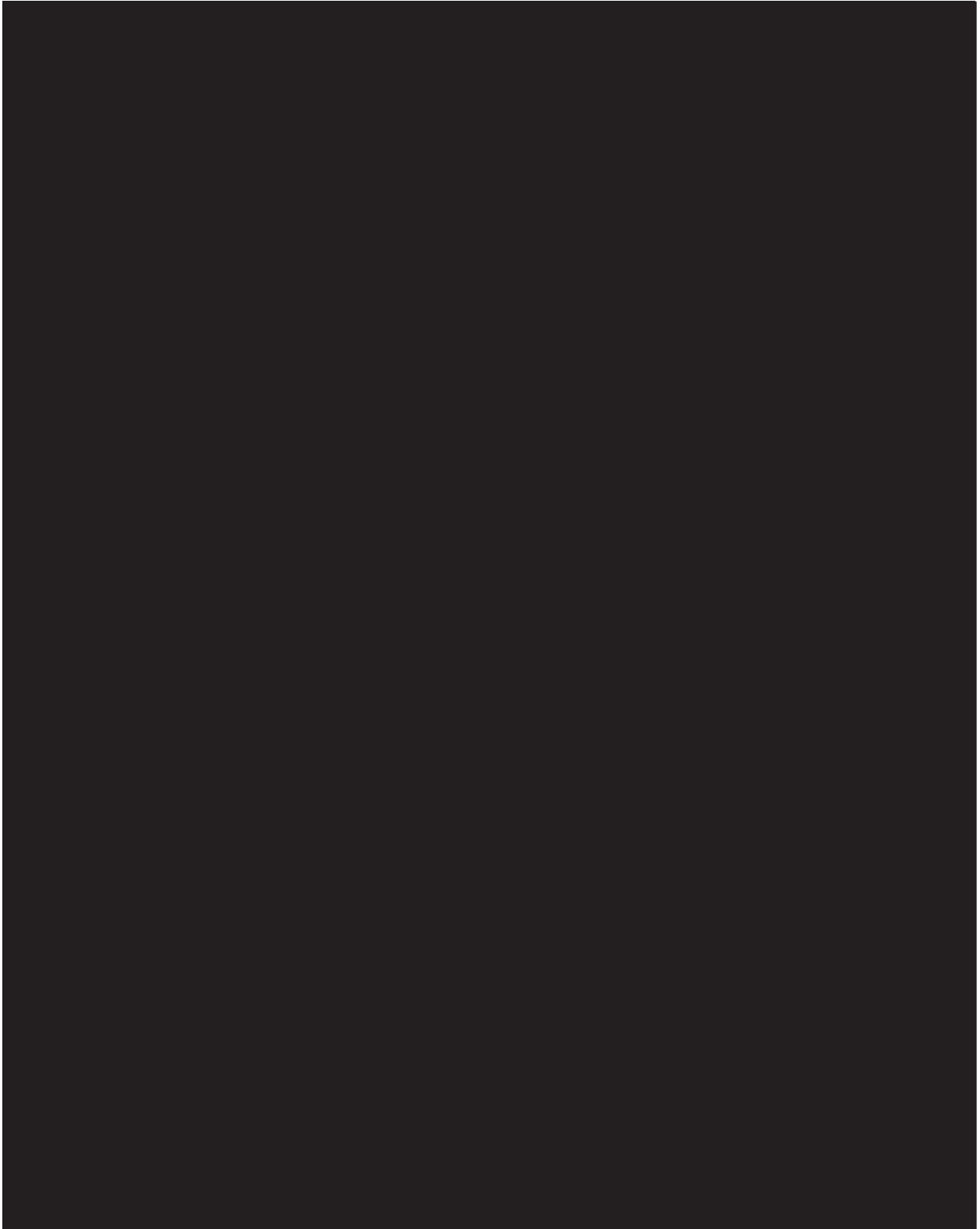
**MUD LAKE TELEPHONE COOPERATIVE ASSOCIATION, INC. AND SUBSIDIARY**  
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**MUD LAKE TELEPHONE COOPERATIVE ASSOCIATION, INC. AND SUBSIDIARY**  
**NOTES TO CONSOLIDATED FINANCIAL STATEMENTS**



**MUD LAKE TELEPHONE COOPERATIVE ASSOCIATION, INC. AND SUBSIDIARY**  
**NOTES TO CONSOLIDATED FINANCIAL STATEMENTS**

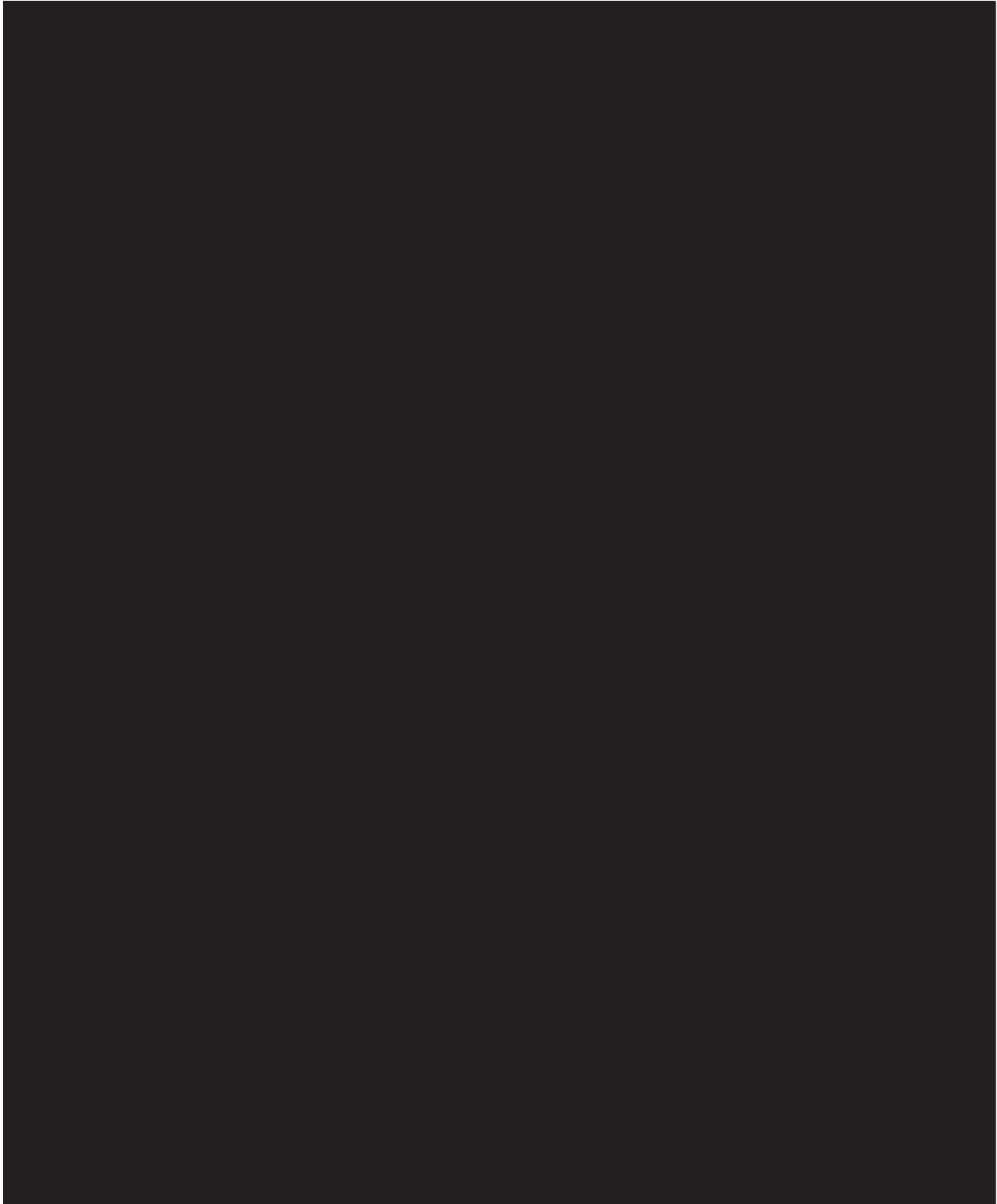
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in Southern and Eastern Texas.

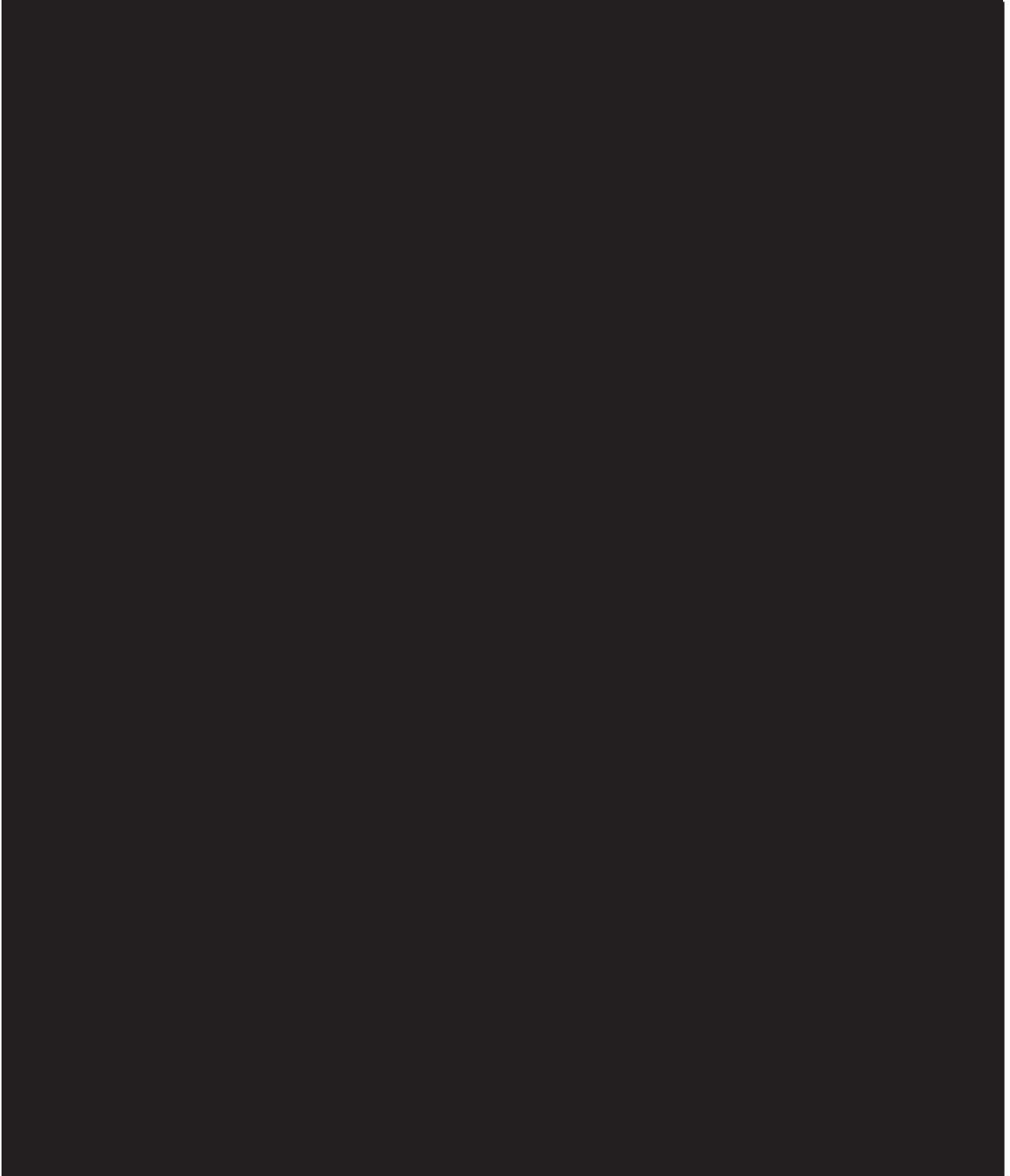
**MUD LAKE TELEPHONE COOPERATIVE ASSOCIATION, INC. AND SUBSIDIARY**  
**NOTES TO CONSOLIDATED FINANCIAL STATEMENTS**

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**MUD LAKE TELEPHONE COOPERATIVE ASSOCIATION, INC. AND SUBSIDIARY**  
**NOTES TO CONSOLIDATED FINANCIAL STATEMENTS**

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**MUD LAKE TELEPHONE COOPERATIVE ASSOCIATION, INC. AND SUBSIDIARY**  
**NOTES TO CONSOLIDATED FINANCIAL STATEMENTS**

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## INDEPENDENT AUDITORS' REPORT ON SUPPLEMENTARY INFORMATION

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Board of Directors  
Mud Lake Telephone Cooperative Association, Inc. and Subsidiary  
Dubois, Idaho

We have audited the consolidated financial statements of Mud Lake Telephone Cooperative Association, Inc. and Subsidiary, as of and for the years ended December 31, 2014 and 2013, and our report thereon dated June 16, 2015, which expressed an unmodified opinion on those financial statements, appears on page 1. Our audits were conducted for the purpose of forming an opinion on the consolidated financial statements as a whole.

The consolidating information on pages 16 and 17 are presented for purposes of additional analysis of the consolidated financial statements rather than to present the financial position, results of operations, and cash flows of the individual companies, and it is not a required part of the consolidated financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the consolidated financial statements. The consolidating information has been subjected to the auditing procedures applied in the audit of the consolidated financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the consolidated financial statements or to the consolidated financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the consolidating information is fairly stated in all material respects in relation to the consolidated financial statements as a whole.

St. Paul, Minnesota  
June 16, 2015

*Olsen Thielson & Co., LTD*

# MUD LAKE TELEPHONE COOPERATIVE ASSOCIATION, INC. AND SUBSIDIARY

## CONSOLIDATING BALANCE SHEET INFORMATION YEAR ENDED DECEMBER 31, 2014

ASSETS				
	<u>Consolidated</u>	<u>Eliminations and Reclassifications</u>	<u>Mud Lake Telephone Cooperative Association</u>	<u>High Plains Propane, LLC</u>
<b>CURRENT ASSETS:</b>				
Cash				
Certificates of Deposit				
Investment Securities				
Due from Customers				
Other Accounts Receivable				
Income Taxes Receivable				
Materials and Supplies				
Propane Inventory				
Prepaid Expenses				
Total Current Assets				
<b>INVESTMENTS AND OTHER ASSETS:</b>				
Certificates of Deposit				
Investment Securities				
Other Investments				
Note Receivable				
Deferred Charges				
Total Investments and Other Assets				
<b>PROPERTY, PLANT AND EQUIPMENT:</b>				
In Service				
Under Construction				
Less Accumulated Depreciation				
Net Property, Plant and Equipment				
<b>TOTAL ASSETS</b>				
LIABILITIES AND MEMBERS' EQUITY				
<b>CURRENT LIABILITIES:</b>				
Accounts Payable				
Advance Billings and Payments				
Total Current Liabilities				
<b>MEMBERS' EQUITY:</b>				
Contributed Capital				
Accumulated Deficit				
Patronage Capital				
Other Equity (Deficit)				
Accumulated Other Comprehensive Income				
Total Members' Equity				
<b>TOTAL LIABILITIES AND MEMBERS' EQUITY</b>				

**MUD LAKE TELEPHONE COOPERATIVE ASSOCIATION, INC. AND SUBSIDIARY**

**CONSOLIDATING STATEMENT OF OPERATIONS INFORMATION  
YEAR ENDED DECEMBER 31, 2014**

	<u>Consolidated</u>	<u>Eliminations</u>	<u>Mud Lake Telephone Cooperative Association</u>	<u>High Plains Propane, LLC</u>
<b>OPERATING REVENUES:</b>				
Local Network				
Network Access				
Internet Services				
Propane Sales				
Lease Revenue				
Other Services				
Miscellaneous				
Uncollectibles, Net				
Total Operating Revenues				
<b>OPERATING EXPENSES:</b>				
Plant, Maintenance and Access				
Depreciation				
Customer				
Corporate				
Other Taxes				
Costs of Good Sold - Propane				
Other Operating - Propane				
Total Operating Expenses				
<b>OPERATING MARGIN (LOSS)</b>				
<b>OTHER INCOME AND EXPENSES:</b>				
Interest, Dividends and Securities Sales				
Sale of Other Assets				
Equity in Investment Earnings				
Equity in Loss of Subsidiary				
Miscellaneous				
Net Other Income and Expenses				
<b>NET MARGINS (LOSS)</b>				